GROUP VI

POTENTIAL RELEASE LOCATIONS (PRLs)

SITE INSPECTION SUMMARY UPDATE

Presented By

Marc P. Smits, Remedial Project Manager
BRAC Program Management Office West
22 October 2008

1

Potential Release Locations (PRLs)

- PRL 296 – Building 296 Maintenance Hanger
- PRL 297 – Building 297 Maintenance Hanger
- PRL 354 – Former Skeet Range
- PRL 605 – Building 605 Maintenance Hanger
- PRL 606 – Building 606 Maintenance Hanger
- PRL RIA – Runway Infield Area

2

PRLs 296 and 297

- PRLs evaluated in 2005 and EPA concurred on no further investigation
- DTSC requested additional investigation to characterize the distribution of lead at these locations in February 2006
- Eleven additional samples were collected at PRL 296 and seventeen additional samples were collected at PRL 297 for lead in soil
- None of the additional soil samples at the two PRLs exceeded the California-modified residential PRG of 150 mg/Kg
- Results indicate that previous detections of lead above the California-modified residential PRG are highly localized and not indicative of a significant release
- Using the exposure point concentration (EPC), the estimated cancer risk is less than 10^{-6} and Hazard Index is less than 1 for both PRLs
- No further investigation is recommended for PRLs 296 and 297

3

PRL 354

- Previous sample results at PRL 354 had detections exceeding EPA Region 9/California-modified residential PRG for lead and PAHs in soil
- Additional soil samples were collected for lead and PAHs in May 2008 to characterize the lateral and vertical distribution in this area
- Reasonable maximum EPC for lead was 157.1 which is comparable with the California-modified PRG
- LeadSpread, Version 7.0 analysis indicated that the soil lead concentration would be protective of a child receptor
- Using the calculated EPC, the carcinogenic risk is $2x10^{-5}$ which is in the risk management range of 10^{-6} to 10^{-4}
- Removing statistical outlier, risk is reduced to $9x10^{-6}$
- No further investigation is recommended for PRL 354

4

PRLs 605 and 606

- PRLs evaluated in 2003 and EPA concurred on no further action.
- DTSC requested additional investigation to characterize the distribution of arsenic at these locations in February 2006
- Additional soil samples were collected in May 2008 to characterize distribution of arsenic in these areas
- An additional eight samples were collected from both PRLs at depths of 1.5 and 4.0 feet
- Arsenic reported above background in shallow soils (1.5 feet) but not in any of the deeper soils (4.0 feet)
- Construction drawings for the buildings called for re-excavation and compaction of top two feet of soil prior to floor construction
- No significant difference in soil descriptions from pre-construction drawings and soil encountered in the site inspection sampling (no fill material)

5

PRLs 605 and 606 (continued)

- Arsenic concentrations are not attributable to Marine Corps aircraft maintenance activities
- Presence of arsenic in the upper 2 feet of the soil under the foundation suggest some form of surface application of herbicides
- Organical-arsenic herbicides have been registered under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) since the 1950s and 1960s (buildings constructed during this timeframe)
- Presence of arsenic as a result of legally applied herbicides does not represent a CERCLA release per CERCLA section 101(22)
- No further investigation recommended for PRLs 605 and 606
- Transferee to be notified of arsenic in shallow soil in transfer documents

6

PRL Runway Infield Area

- Surface soil sampled along runway infield areas in 2003 and analyzed for PCBs, PAHs, and TPH in 13 areas
- EPA and DTSC requested additional sampling in April 2003
- Grading activities conducted as part of the runway demolition and to support station redevelopment in 2007. Grading activities conducted under a PERF which was reviewed and concurred upon by the regulatory agencies.
- Sampling conducted, in 2008, as part of the SI to characterize the distribution of PAHs after grading operations
- A total of 28 soil samples were collected
- None of the reported concentrations of PAHs exceeded EPA's Region 9 residential soil PRGs
- Using the calculated EPC, the cancer risk is 1 $x10^{-6}$
- No further investigation is recommended for PRL RIA

7

Schedule

- Submit Draft PRL Group VI SI Report — 22 October 2008
- Regulatory Review — 23 Oct – 21 Nov 2008
- Submit Final PRL Group VI SI Report — 18 December 2008

8